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March 26, 2020

VIA CM/ECF ONLY

Hon. Michael A. Shipp, U.S.D.J.
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Conroy v. Lacey Twp. Sch. Dist., et al.
Civil Action No. 19-9452 (MAS-TJB)

Dear Judge Shipp:

This Firm represents Defendants Lacey Township Board of Education, Craig Wiley, Mark Angelo, and Craig Cicardo (the “Lacey BOE Defendants”) in the above-referenced matter. With the consent of plaintiffs’ counsel, I am writing to request a two-week extension—until April 9, 2020—to file our responsive pleading.

Pursuant to the Clerk’s extension granted on March 12, 2020, the Lacey BOE Defendants’ responsive pleading is due today, March 26, 2020. Unfortunately, since early March, I have been battling an illness that has refused to cease. In addition, the illness has spread throughout my household and we are now awaiting my wife’s results for the COVID-19 test. I have been on a reduced workload for the last two weeks while caring for our two young children (aged 3 and 6). A two-week extension will allow me the time necessary to prepare a responsive pleading. For these reasons, I respectfully request a two-week extension to file our responsive pleading.

If Your Honor has any questions or concerns, please contact me. Thank you.

Respectfully submitted,

/s/Roshan D. Shah

ROSHAN D. SHAH, ESQ.
For the Firm

c: All Counsel of Record

January 23, 2020

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